

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS – AUSTIN DIVISION**

**PAMELA DE SOMOV,**  
Plaintiff,

v.

**JULIE BARNES** aka Julie Anne Barnes aka Julie Beam and  
**MARGARET SANO** aka Meg Sano,  
Defendants.  
Civil Action No. 1:25-cv-00717-RP

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**PLAINTIFF’S MOTION TO STRIKE AND SEAL IMPROPER  
FILINGS, TO GRANT INJUNCTIVE RELIEF AS  
UNOPPOSED, AND FOR ENTRY OF DEFAULT**

TO THE HONORABLE COURT:

Plaintiff Pamela DE SOMOV respectfully moves the Court for an order:

1. Striking and sealing multiple improper, untimely, and abusive filings;
  2. Treating the Motion for Preliminary Injunction as unopposed;
  3. Entering default judgment due to Defendants’ failure to respond to the operative complaint;
  4. Directing Defendants to comply with Federal and Local Rules regarding pleading standards and address disclosure.
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**I. BACKGROUND AND PROCEDURAL POSTURE**

Defendants Julie Barnes and Margaret Sano have persistently obstructed litigation through improper filings rather than responding to Plaintiff’s First Amended Complaint as required by the Federal Rules of Civil Procedure. They have:

- Failed to respond to operative pleadings;
- Submitted duplicative, frivolous motions;
- Ignored rules of service, citation, and pleading format;
- Used expunged records and personal attacks in filings;
- Misused aliases, misleading captions, and a P.O. Box to avoid proper service.

Their approach appears designed to disrupt the proceeding, create confusion, and avoid the actual merits of the claims.

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**II. MOTION TO STRIKE AND SEAL FILINGS**

Plaintiff requests the Court strike and/or seal the following:

Docket	Title	Grounds
18	Motion to Deny Injunction	Unauthorized; lacks certificate of service; improperly styled
19	Motion to Dismiss First Amended Complaint	Filed June 7, 2025; misdirected and ambiguous regarding operative pleading; not properly served; fails to address or answer First Amended Complaint as required by Rule 12

<b>23</b>	Motion to Dismiss Motion for Leave to Amend	Moot; improperly attacks procedural request; format defects
<b>24</b>	Motion to Deny Plaintiff's IFP	Retaliatory and speculative; discloses private financial data; intended to harass
<b>25</b>	Motion to Dismiss Second Amended Complaint	Directed at inoperative pleading; includes irrelevant and expunged material
<b>26</b>	Declaration re: IFP	Duplicative, inflammatory tone; no legal basis; harassing intent
<b>29</b>	Opposition to Motion for Protective Order	Retaliatory in nature; repeats content already addressed; includes inflammatory language and speculative attacks; filed without proper service, reflecting broader pattern of procedural evasion and harassment

Dkts. 24, 25, 26, and 29 should be **sealed** due to their inclusion of sensitive personal and financial information.

**In support of this request**, Plaintiff attaches as **Exhibit A** a **Cease and Desist Letter issued by the Travis County Sheriff's Office, dated December 7, 2023**, which instructed Defendant Barnes to cease ongoing harassing communications and behavior, including electronic harassment and public dissemination of harmful content. The filings at issue disregard this law enforcement instruction and reflect continued misuse of the public docket to harass and defame Plaintiff.

### **III. MOTION TO GRANT PRELIMINARY INJUNCTION AS UNOPPOSED**

Plaintiff's Motion for Preliminary Injunction (Dkt. 18) was filed on May 12, 2025. Under Local Rule CV-7(d)(2), Defendants had until May 27, 2025, to respond. However, they never filed a procedurally valid opposition within that time frame.

The only filing related to Plaintiff's injunctive motion, Docket 19, was submitted on June 7, 2025 — over a week late — and purports to address an unspecified “Amended Complaint” without clarity. It was also not properly served on Plaintiff, violating Federal Rule of Civil Procedure 5. The filing lacks legal analysis, is misdirected, and appears designed to confuse the issues before the Court.

Moreover, Defendants Barnes and Sano have continued to post harassing content about Plaintiff as recently as one week ago on a public blog. These updates include sensitive and reputationally damaging information, underscoring the ongoing nature of the harm and supporting the urgency of injunctive relief.

Plaintiff respectfully requests the Court deem the Motion for Injunction unopposed and grant it in full.

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### **IV. MOTION FOR ENTRY OF DEFAULT**

Plaintiff filed her First Amended Complaint (Dkt. 12) on June 3, 2025. To date, Defendants have not filed an answer. Their filing at Dkt. 25 addresses the unapproved Second Amended Complaint, and not the operative pleading.

Their failure to file an answer or proper responsive pleading within the required timeframe justifies entry of default under Rule 55(a).

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## **V. REQUEST TO ENFORCE PLEADING STANDARDS**

Plaintiff requests that Defendants be directed to comply with the following:

- FRCP 10 and Local Rule CV-10 (pleading structure and captioning);
- FRCP 11(b) (avoiding frivolous claims and improper purpose);
- FRCP 5(b)(2), Local Rule CV-5 (service and disclosure of addresses).

Defendants' excessive use of aliases, P.O. Box concealment, and erratic filings undermine judicial economy and violate minimum pleading standards.

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## **VI. CLARIFICATION REGARDING PLAINTIFF'S IFP STATUS**

Defendants have improperly sought to challenge Plaintiff's previously granted IFP status via filings that are irrelevant and retaliatory. Dkts. 24–26 and 29 contain speculative commentary and private content not appropriate for public record. The Court has already approved Plaintiff's IFP (Dkt. 2). If required, Plaintiff will submit updated information under seal.

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## **VII. PRAYER FOR RELIEF**

Plaintiff respectfully requests the Court:

1. Strike and seal the filings listed above;

2. Grant the Motion for Preliminary Injunction as unopposed;
3. Enter Default Judgment or direct the Clerk to enter default;
4. Order Defendants to adhere to federal and local rules for pleadings and disclosure;
5. Grant such other relief as the Court deems just and proper.

Respectfully submitted,  
**/s/ Pamela DE SOMOV**  
**Pamela de Somov, Pro Se**  
2831 Eldorado Pkwy, Ste 103  
PMB 203  
Frisco, TX 75033  
702-789-8307  
pdesomov@gmail.com

*Plaintiff uses a private mailing address and email for security and practical reasons. Due to frequent travel for professional obligations and the documented harassment by Defendants, a stable and confidential point of contact is essential for litigation-related communications.*

**Dated: June 24, 2025**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS – AUSTIN DIVISION**

**PAMELA DE SOMOV,**

Plaintiff,

v.

**JULIE BARNES aka Julie Anne Barnes aka Julie Beam and**

**MARGARET SANO aka Meg Sano,**

Defendants.

Civil Action No. 1:25-cv-00717-RP

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**[PROPOSED] ORDER GRANTING PLAINTIFF’S MOTION  
TO STRIKE AND SEAL, GRANT INJUNCTION, AND  
ENTER DEFAULT**

Before the Court is Plaintiff’s Motion to Strike and Seal Improper Filings, to Grant Injunctive Relief as Unopposed, and for Entry of Default. After reviewing the filings, the applicable law, and the procedural history, and the attached exhibit in support of the motion, the Court finds good cause to grant the motion.

IT IS ORDERED THAT:

1. Dockets **18, 19, 23, 24, 25, 26**, and **29** are hereby **STRICKEN** from the record as procedurally defective, redundant, or improper;
2. Dockets **24, 25, 26**, and **29** are further **SEALED** due to the inclusion of confidential, inflammatory, or retaliatory content;
3. Plaintiff’s **Motion for Preliminary Injunction** (Dkt. 18) is deemed **UNOPPOSED** and is **GRANTED**;
4. The Clerk is directed to **ENTER DEFAULT** against Defendants for failure to timely respond to the operative complaint (Dkt. 12) under Fed. R. Civ. P. 55(a);
5. Defendants are ORDERED to comply with **Fed. R. Civ. P. 10, Fed. R. Civ. P. 11(b), Fed. R. Civ. P. 5**, and **Local Rule CV-10** with respect to future filings;

6. Defendants must provide a **valid residential address** for service in compliance with Federal and Local Rules;
7. Defendants are prohibited from using pseudonyms, fictitious aliases, or irrelevant “aka” names in future pleadings;
8. Any further submissions from Defendants that fail to comply with these requirements may be summarily denied or sanctioned.

IT IS SO ORDERED.

SIGNED this \_\_\_\_ day of \_\_\_\_\_, 2025.

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HON. ROBERT PITMAN  
UNITED STATES DISTRICT JUDGE



## **CERTIFICATE OF SERVICE**

I hereby certify that on **June 25, 2025**, I served a true and correct copy of the **Second Amended Complaint** on the following parties via **U.S. Mail**

**Julie Barnes.**

aka Julie Anne Barnes aka Julie Beam

Email: JulieSCV@gmail.com

Mailing Address:

P.O. Box 470

East Amherst, NY 14051

**Margaret Sano**

aka Meg Sano

Email: Sano425@yahoo.com

Mailing Address:

P.O. Box 470

East Amherst, NY 14051

Executed on June 24, 2025.

Frisco, Texas

**/s/ Pamela de Somov**

Pamela de Somov

Pro Se Plaintiff

2831 Eldorado Pkwy, Ste 103, PMB 203

Frisco, TX 75033

Phone: (702) 789-8307

Email: pdesomov@gmail.com